

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

HAYWARD INDUSTRIES, INC.,

Plaintiff,

v.

BLUEWORKS CORPORATION,
BLUEWORKS INNOVATION
CORPORATION, NINGBO C.F.
ELECTRONIC TECH CO., LTD; NINGBO
YISHANG IMPORT AND EXPORT CO.,
LTD.

Defendants.

Civil Action No. 3:20-CV-710 -MOC-DSC

MOTION TO MODIFY STIPULATED PROTECTIVE ORDER

COMES NOW Plaintiff Hayward Industries, Inc., by and through its undersigned counsel, and pursuant to FED. R. CIV. P. 26(c), and hereby moves to modify the Stipulated Protective Order entered in this case to allow Hayward and its counsel to use all documents and protected information produced to Hayward to collect and enforce Hayward's Judgment and to allow Hayward and its counsel to retain and use the documents and protected information until the Judgment is satisfied in collections/enforcement actions in all of the states throughout the United States of America (and abroad). Hayward has consulted with Defendants' counsel regarding the relief requested in this motion, and Defendants do not consent to the relief sought.

In support of its motion, Hayward files contemporaneously herewith a memorandum of law in support.

WHEREFORE, Hayward moves this Honorable Court for an Order modifying the Stipulated Protective Order entered in this case as set forth above.

Respectfully submitted this the 1st day of June, 2024,

HAYWARD INDUSTRIES, INC.

/s/ B. Chad Ewing
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